

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Apr 30, 2025

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAY W. FINCH,

Defendant.

No. 4:25-CR-06013-MKD

STIPULATED PROTECTIVE
ORDER REGARDING
IDENTIFICATION OF MINOR
VICTIM PURSUANT TO
18 U.S.C. § 3509, AND ORDER
GRANTING MOTION TO
EXPEDITE

ECF Nos. 27, 28

Before the Court are the parties' Stipulation for Protective Order Regarding Identification of Minor Victim Pursuant to 18 U.S.C. § 3509, ECF No. 27, and the United States' related Motion to Expedite, ECF No. 28. Given the nature of the allegations in this case, the parties stipulate to impose privacy protection measures pursuant to 18 U.S.C. § 3509. The Court has reviewed the motions and the record and is fully informed. The Court finds good cause to grant the motions.

Accordingly, **IT IS HEREBY ORDERED:**

1 1. The parties' Stipulation for Protective Order Regarding Identification
2 of Minor Victim Pursuant to 18 U.S.C. § 3509, **ECF No. 27**, and the United States'
3 Motion to Expedite, **ECF No. 28**, are **GRANTED**.

4 2. The privacy protection measures mandated by 18 U.S.C. § 3509(d),
5 which apply when a case involves a person under the age of eighteen years who is
6 alleged to be a victim of a crime of sexual exploitation, or a witness to a crime
7 committed against another person, apply to this case.

8 3. All persons acting in this case in a capacity described in 18 U.S.C.
9 § 3509(d)(1)(B), shall:

- 10 a. Keep all documents that disclose the names, identities, or any
11 other information concerning minors in a secure place to which
12 no person who does not have reason to know their contents has
13 access;
- 14 b. Disclose such documents or the information in them that
15 concerns minors only to persons who, by reason of their
16 participation in the proceeding, have reason to know such
17 information;
- 18 c. Not permit Defendant himself to review discovery outside the
19 presence of defense counsel or a defense investigator;
- 20 d. Not permit Defendant to keep discovery in his own possession

1 outside the presence of defense counsel or a defense
2 investigator; and

3 e. Not permit Defendant to keep, copy, or record the identities of
4 any minor or victim identified in discovery in this case.

5 4. All papers to be filed in Court that disclose the names or any other
6 information identifying or concerning minors shall be filed under seal without
7 necessity of obtaining a Court order, and that the person who makes the filing shall
8 submit to the Clerk of the Court:

9 a. The complete paper to be kept under seal; and

10 b. The paper with the portions of it that disclose the names or
11 other information identifying or concerning children redacted,
12 to be placed in the public record.

13 5. The parties and the witnesses shall not disclose minors' identities
14 during any proceedings connected with this case. The parties and witnesses will
15 refer to alleged minor victims only by using agreed-upon initials or pseudonyms
16 (e.g., "Minor Victim 1"), rather than their bona fide names, in motions practice,
17 opening statements, during the presentation of evidence, in closing arguments, and
18 during sentencing.

19 6. The government may produce discovery to the defense that discloses
20 the identity and images of alleged minor victims in this case, in order to comply

1 with the government's discovery obligations. Defendant, the defense team,
2 Defendant's attorneys and investigators, and all of their externs, employees, and/or
3 staff members, shall keep this information confidential as set forth above.

4 7. This ORDER shall apply to any attorneys who subsequently become
5 counsel of record, without the need to renew or alter the ORDER.

6 8. This ORDER shall apply to the personal identifying information and
7 images of any minors who are identified over the course of the case, whether or not
8 such minors are known to the government and/or Defendant at the time the
9 ORDER is entered by the Court.

10 **IT IS SO ORDERED.** The Clerk's Office is directed to enter this Order
11 and provide copies to all counsel.

12 **DATED** April 30, 2025.

13 s/Mary K. Dimke
14 MARY K. DIMKE
UNITED STATES DISTRICT JUDGE